

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

2009 APR 27 PM 3:57

CLERK, US DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MC
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMIR JAMAL DANIELS,

Defendant.

NO. 09-M-2828-M

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant has been charged by Complaint with a violation of Title 18, United States Code, Section 2423(a), Transportation of Minor to Engage in Criminal Sexual Conduct; Title 18, United States Code, Section 2423(b), Travel with Intent to Engage in Illicit Sexual Activity; and Title 18, United States Code, Section 2422(a) & Section 2422(b), Coercion and Enticement of a Minor.

2. The Defendant is a United States citizen, however, Defendant presents a high risk of fleeing to avoid prosecution on this charge.

3. There is a presumption that no condition or combination of conditions will reasonably assure the safety of the community in a case involving a minor victim.

4. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

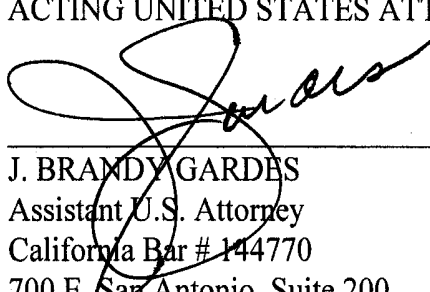
The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JOHN E. MURPHY
ACTING UNITED STATES ATTORNEY

BY:



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